



#### UNITED STATES PIPE AND FOUNDRY COMPANY, LLC

#### 1295 WHIPPLE ROAD UNION CITY, CALIFORNIA 94587 (510) 441-5810

January 29, 2019

Bay Area Air Quality Management District Director of Enforcement 375 Beale Street, Suite 600 San Francisco, CA 94105

Subject:

Title V Monitoring Report - Facility #A0083

Dear Mr. Wayne Kino:

United States Pipe and Foundry Company, LLC, Union City Pipe Plant, is required to submit a semi-annual report because of the standard condition in Section 1 of the Major Facility Review Permit. In Accordance with the C& E Advisor, dated December 5, 1997, the following summary is provided for the reporting period from July 1 through December 31, 2018:

In accordance with the permit, the facility conducts Method 22 visible emissions inspections as required by permit conditions for Sources S1, S4, S5, S8, S15, and S16. The facility also conducts regular maintenance inspections of A10 and A12 baghouses in accordance with the permit conditions for Sources S1 and S4. The facility keeps records of the sulfur content of coke received as a surrogate means of ensuring compliance with BAAQMD Regulation 9-1-304. The facility keeps chart recordings of the key parameters related to the operation of source S1. All of the above records have been retained since July 1, 1997 and will be kept for five years in accordance with the permit.

Under penalty of perjury, I certify that the aforementioned is true, accurate, and complete. I also certify that I am the responsible official as defined in District Regulation 2, Rule 6.

Sincerely,

UNITED STATES PIPE AND FOUNDRY COMPANY, LLC

Henry W.'Mentink Plant Manager

cc: D.M. Araza, Environmental Engineer

| Type of | Citation  | r.c.          | Future            |  | Monitoring<br>Requirement                      | Monitoring<br>Frequency | Monitoring  | Comp | liance |
|---------|---|---------------|-------------------|--|--|-------------------------|---|------|--------|
| Limit   | of Limit  | FE<br>Y/<br>N | Effective<br>Date | Limit  | Citation                                       | (P/C/N)                 | Туре  | Yes  | No     |
|         |   |               |                   |  |  |                         |   |      |        |
| Opacity | BAAQMD<br>6-1-301<br>and SIP 6-<br>301              | Y             |                   | Ringelmann No.1 ≤ 3 minutes aggregated in any hour | BAAQMD<br>Condition<br>#2274, Parts<br>4 and 5 | С                       | temperature<br>monitor,<br>pressure drop<br>monitor | Y    |        |
|         | BAAQMD<br>6-1-301<br>and SIP 6-<br>301 <sup>1</sup> | Y             |                   | Ringelmann No.1 ≤ 3 minutes aggregated in any hour | BAAQMD<br>Condition<br>#2274, Part 8           | P/D                     | preventative<br>maintenance<br>records              | Y    |        |
|         | BAAQMD<br>6-1-301<br>and SIP 6-<br>301              | Y             |                   | Ringelmann No.1 ≤ 3 minutes aggregated in any hour | BAAQMD<br>Condition<br>#2274, Part 9           | P/D                     | Visible<br>emission<br>monitoring                   | Y    |        |
|         | BAAQMD<br>6-1-301<br>and SIP 6-<br>301              | Y             |                   | Ringelmann No.1 ≤ 3 minutes aggregated in any hour | 40 CFR<br>63.10897                             | С                       | temperature<br>monitor,<br>pressure drop<br>monitor | Y    |        |
| PM      | BAAQMD<br>6-1-305<br>and SIP 6-<br>305              | Y             |                   | Fallout of visible particles                       | BAAQMD<br>Condition<br>#2274, Parts<br>4 and 5 | С                       | temperature<br>monitor,<br>pressure drop<br>monitor | Y    |        |
| FP      | BAAQMD<br>6-1-310<br>and SIP 6-<br>310              | Y             |                   | 0.15 gr/dscf                                       | BAAQMD<br>Condition<br>#2274, Parts<br>4 and 5 | С                       | temperature<br>monitor,<br>pressure drop<br>monitor | Y    |        |
|         | BAAQMD<br>6-1-310<br>and SIP 6-<br>310              | Y             |                   | 0.15 gr/dscf                                       | 40 CFR<br>63.10897                             | С                       | temperature<br>monitor,<br>pressure drop<br>monitor | Y    |        |

| Type of<br>Limit | Citation of Limit                      | FE         | Future<br>Effective |   | Monitoring<br>Requirement                      | Monitoring<br>Frequency | Monitoring   | Comp | liance |
|------------------|--|------------|---------------------|---|--|-------------------------|--|------|--------|
|                  |  | <b>Y</b> / | Date                | Limit   | Citation                                       | (P/C/N)                 | Туре   | Yes  | No     |
|                  |  | N          |                     |   |  | , ,                     |  |      |        |
| FP               | BAAQMD<br>6-1-311<br>and SIP 6-        | Y          |                     | 40 lb/hr  | BAAQMD<br>Condition<br>#2274, Parts<br>4 and 5 | С                       | Temperature monitor, pressure drop monitor                     | Y    |        |
|                  | BAAQMD<br>6-1-311<br>and SIP 6-<br>311 | Y          |                     | 40 lb/hr  | 40 CFR<br>63.10897                             | С                       | Temperature monitor, pressure drop monitor                     | Y    |        |
| SO <sub>2</sub>  | BAAQMD<br>9-1-301                      | Y          |                     | GLC <sup>1</sup> of 0.5 ppm<br>for 3 min or 0.25<br>ppm for 60 min or<br>0.05 ppm for 24<br>hours |  | N                       |  | Y    |        |
|                  | BAAQMD<br>9-1-302                      | Y          |                     | sulfur emissions<br>not to exceed 300<br>ppm, dry   | BAAQMD<br>Condition<br>#2274, part 7           | P/E                     | Fuel certification; Source test when coke sulfur exceeds 0.75% | Y    |        |
|                  | BAAQMD<br>9-1-304                      | Y          |                     | sulfur content of<br>solid fuel limited<br>to ensure<br>SO2≤300ppmd                               | BAAQMD<br>condition<br>#2274, part 7           | P/E                     | Fuel certification; Source test when coke sulfur exceeds 0.75% | Y    | :      |
| SO2              | BAAQMD<br>Condition<br>#2274, part     | Y          |                     | Sulfur content of coke not to exceed 1.0%   | BAAQMD<br>condition<br>#2274, part 7           | P/E                     | Fuel<br>certification  | Y    |        |

| Type of<br>Limit   | Citation of Limit                       | FE      | Future<br>Effective |  | Monitoring<br>Requirement             | Monitoring<br>Frequency | Monitoring                               | Comp | liance |
|--|---|---------|---------------------|--|---------------------------------------|-------------------------|--|------|--------|
| Limit  | or Emit                                 | Y/<br>N | Date                | Limit  | Citation                              | (P/C/N)                 | Type                                     | Yes  | No     |
| Lead   | BAAQMD<br>11-1-301                      | Y       |                     | 15 lb/day  | BAAQMD<br>Condition<br>#2274, part 10 | P/E                     | Initial Source<br>Test                   | Υ .  |        |
|  | BAAQMD<br>11-1-302                      | Y       |                     | GLC <sup>1</sup> not to<br>exceed 1.0 ug/m <sup>3</sup><br>averaged over 24<br>hrs | BAAQMD<br>Condition<br>#2274, part 10 | P/E                     | Initial Source<br>Test                   | Y    |        |
| РМ   | 40 CFR<br>63.10895<br>(c)               | Y       |                     | 0.8 pounds of PM per ton of metal charged  | 40 CFR<br>63.10898                    | P/E                     | Initial Source<br>Test                   | Y    |        |
| НАР  | 40 CFR<br>63.10895<br>(c)               | Y       |                     | 0.06 pounds of total metal HAP per ton of metal charged                            | 40 CFR<br>63.10898                    | P/E                     | Initial Source<br>Test                   | Y    |        |
| Grey iron<br>throughput  | BAAQMD<br>Condition<br>#2274,<br>part 2 | Y       |                     | 600 tons per day   | BAAQMD<br>Condition<br>2274, part 6   | P/ D                    | Records                                  | Y    |        |
| Afterburner<br>Temperature<br>limit (On-<br>Blast/Reduc<br>ed Blast) | BAAQMD<br>Condition<br>#2274,<br>part 3 | Y       | :                   | 1550oF   | BAAQMD<br>Condition<br>2274, part 5   | С                       | Continuous Temperature monitor/recor der | Y    |        |

| Type of<br>Limit                           | Citation of Limit                        | FE      | Future<br>Effective |  | Monitoring<br>Requirement                | Monitoring<br>Frequency | Monitoring                               | Comp | liance |
|--|--|---------|---------------------|--|--|-------------------------|--|------|--------|
|  |  | Y/<br>N | Date                | Limit  | Citation                                 | (P/C/N)                 | Туре                                     | Yes  | No     |
| Afterburner Temperature limit (Off- Blast) | BAAQMD<br>Condition<br>#2274,<br>part 3  | Y       |                     | ≥700oF   | BAAQMD<br>Condition<br>2274, part 5      | С                       | Continuous Temperature monitor/recor der | Y    |        |
| Baghouse<br>Pressure<br>Drop               | BAAQMD<br>Condition<br>#2274,<br>part 4  | Y       |                     | Pressure drop across bags not to exceed 8 inches water column or to fall below 1 inch water column | BAAQMD<br>Condition<br>#2274, part<br>13 | С                       | Pressure drop<br>monitor                 | Y    |        |
| TSP  | BAAQMD<br>Condition<br>#2274,<br>part 11 | Y       |                     | 0.006 gr/dscf  | BAAQMD<br>Condition<br>#2274, part       | N                       | Source Test                              | Y    |        |

<sup>&</sup>lt;sup>1</sup> Ground Level Concentration

## Applicable Limits and Compliance Monitoring Requirements

#### Table VII-B S-4 Ductile Treating Station

| Type of<br>Limit | Citation of                             | FE  | Future            | Limit   | Monitoring                           | Monitoring           | Monitoring                             | Comp | liance |
|------------------|---|-----|-------------------|---|--------------------------------------|----------------------|--|------|--------|
|                  | Limit                                   | Y/N | Effective<br>Date |   | Requirement<br>Citation              | Frequency<br>(P/C/N) | Туре                                   | Yes  | No     |
| Opacity          | BAAQMD<br>6-1-301 and<br>SIP 6-301      | Y   |                   | Ringelmann No.1 ≤ 3 minutes aggregated in any hour  | BAAQMD<br>Condition<br>#1783, Part 3 | С                    | pressure drop<br>monitor               | Y    |        |
|                  | BAAQMD<br>6-1-301 and<br>SIP 6-301      | Y   |                   | Ringelmann No.1 ≤ 3 minutes aggregated in any hour  | BAAQMD<br>Condition<br>#1783, Part 6 | P/W                  | preventative<br>maintenance<br>records | Y    |        |
|                  | BAAQMD<br>6-1-301 and<br>SIP 6-301      | Y   |                   | Ringelmann No.1  ≤ 3 minutes aggregated in any hour   | BAAQMD<br>Condition<br>#1783, Part 7 | P/W                  | Visible<br>emission<br>monitoring      | Y    |        |
| PM               | BAAQMD<br>6-1-305 and<br>SIP 6-305      | Y   |                   | Fallout of visible particles  | BAAQMD<br>Condition<br>#1783, Part 3 | С                    | Pressure<br>drop monitor               | Y    |        |
| FP               | BAAQMD<br>6-1-310 and<br>SIP 6-310      | Y   |                   | 0.15 gr/dscf  | BAAQMD<br>Condition<br>#1783, Part 3 | С                    | Pressure<br>drop monitor               | Y    |        |
| FP               | BAAQMD<br>6-1-311 and<br>SIP 6-311      | Y   | ····              | 40 lb/hr  | BAAQMD<br>Condition<br>#1783, Part 3 | С                    | Pressure<br>drop monitor               | Y    |        |
| Lead             | BAAQMD<br>11-1-301                      | Y   |                   | 15 lb/day   |                                      | N                    |  | Y    |        |
|                  | BAAQMD<br>11-1-302                      | Y   |                   | GLC <sup>1</sup> not to<br>exceed 1.0 ug/m <sup>3</sup><br>averaged over 24<br>hrs                |                                      | N                    |  | Y    |        |
| SO <sub>2</sub>  | 9-1-301                                 | Y   |                   | GLC <sup>1</sup> of 0.5 ppm<br>for 3 min or 0.25<br>ppm for 60 min or<br>0.05 ppm for 24<br>hours |                                      | N                    |  | Y    |        |
|                  | 9-1-302                                 | Y   |                   | sulfur emissions<br>not to exceed 300<br>ppm, dry   |                                      | N                    |  | Y    |        |
| SO2              | BAAQMD<br>Condition<br>#1783,<br>part 2 | Y   |                   | 150 lb/day  |                                      | N                    |  | Y    |        |

# Applicable Limits and Compliance Monitoring Requirements Table VII-B S-4 Ductile Treating Station

| Type of C                    | Citation of Limit                       | FE<br>Y/N | Future<br>Effective | Limit   | Monitoring<br>Requirement | Monitoring<br>Frequency | Monitoring<br>Type       | Comp | liance |
|------------------------------|---|-----------|---------------------|---|---------------------------|-------------------------|--------------------------|------|--------|
|                              | Limit                                   | */14      | Date                | -   | Citation                  | (P/C/N)                 |                          | Yes  | No     |
| Baghouse<br>Pressure<br>Drop | BAAQMD<br>Condition<br>#1783,<br>part 5 | Y         |                     | Pressure drop<br>across bags not to<br>exceed 6 inches<br>water column or to<br>fall below 1/4 inch<br>water column | 1)                        | С                       | Pressure<br>drop monitor | Y    |        |

<sup>&</sup>lt;sup>1</sup> Ground Level Concentration

## **Applicable Limits and Compliance Monitoring Requirements**

#### Table VII-C S-5 Ladle Lancing

| Туре        | Citation of                        | FE  | Future            | Limit  | Monitoring                               | Monitoring           | Monitoring                             | Compl | iance |
|-------------|------------------------------------|-----|-------------------|--|--|----------------------|--|-------|-------|
| of<br>Limit | Limit                              | Y/N | Effective<br>Date |  | Requiremen<br>t Citation                 | Frequency<br>(P/C/N) | Туре                                   | Yes   | No    |
| Opacity     | BAAQMD<br>6-1-301 and<br>SIP 6-301 | Y   |                   | Ringelmann No.1 ≤ 3 minutes aggregated in any hour | BAAQMD<br>Condition<br>#14989, Part      | P/D                  | preventative<br>maintenance<br>records | Y     |       |
|             | BAAQMD<br>6-1-301 and<br>SIP 6-301 | Y   |                   | Ringelmann No.1 ≤ 3 minutes aggregated in any hour | BAAQMD<br>Condition<br>#14989, Part<br>2 | P/W                  | Visible<br>emission<br>monitoring      | Y     |       |
|             | BAAQMD<br>6-1-305 and<br>SIP 6-305 | Y   |                   | Fallout of visible particles                       |  | N                    |  | Y     |       |
| FP          | BAAQMD<br>6-1-310 and<br>SIP 6-310 | Y   |                   | 0.15 gr/dscf                                       |  | N                    |  | Y     |       |
|             | BAAQMD<br>6-1-311 and<br>SIP 6-311 | Y   |                   | 40 lb/hr   |  | N                    |  | Y     |       |

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## Applicable Limits and Compliance Monitoring Requirements

#### Table VII-D S-8 Bell Blowout

| Type of Limit             |   | FE  | Future            | Limit   | Monitoring                           | Monitoring           | Monitoring                        | Comp | liance |
|---------------------------|---|-----|-------------------|---|--------------------------------------|----------------------|-----------------------------------|------|--------|
|                           | Limit                                   | Y/N | Effective<br>Date |   | Requirement<br>Citation              | Frequency<br>(P/C/N) | Type                              | Yes  | No     |
| Opacity                   | BAAQMD<br>6-1-301 and<br>SIP 6-301      | Y   |                   | Ringelmann No.1 ≤ 3 minutes aggregated in any hour  | BAAQMD<br>Condition<br>#2212, Part 3 | С                    | pressure<br>drop<br>monitor       | Y    |        |
|                           | BAAQMD<br>6-1-301 and<br>SIP 6-301      | Y   |                   | Ringelmann No.1 ≤ 3 minutes aggregated in any hour  | BAAQMD<br>Condition<br>#2212, Part 4 | P/W                  | Visible<br>emission<br>monitoring | Y    |        |
| PM                        | BAAQMD<br>6-1-305 and<br>SIP 6-305      | Y   |                   | Fallout of visible particles  | BAAQMD<br>Condition<br>#2212, Part 3 | С                    | pressure<br>drop<br>monitor       | Y    |        |
| FP                        | BAAQMD<br>6-1-310 and<br>SIP 6-310      | Y   |                   | 0.15 gr/dscf  | BAAQMD<br>Condition<br>#2212, Part 3 | С                    | pressure<br>drop<br>monitor       | Y    |        |
|                           | BAAQMD<br>6-1-311 and<br>SIP 6-311      | Y   |                   | 40 lb/hr  | BAAQMD<br>Condition<br>#2212, Part 3 | С                    | pressure<br>drop<br>monitor       | Y    |        |
| Baghouse<br>Pressure Drop | BAAQMD<br>Condition<br>#2212,<br>part 2 | Y   |                   | Pressure drop<br>across bags not to<br>exceed 6 inches<br>water column or to<br>fall below 1/4 inch<br>water column | BAAQMD<br>Condition<br>#2212, part 3 | С                    | Pressure<br>drop<br>monitor       | Y    |        |

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## Applicable Limits and Compliance Monitoring Requirements

### Table VII-E S-15 Annealing Oven

| Type of         | ц :                                | FE  | Future            | Limit  | Monitoring                            | Monitoring           | Monitoring                        | Comp | liance |
|-----------------|------------------------------------|-----|-------------------|--|---------------------------------------|----------------------|-----------------------------------|------|--------|
| Limit           | Limit                              | Y/N | Effective<br>Date |  | Requirement<br>Citation               | Frequency<br>(P/C/N) | Туре                              | Yes  | No     |
| Opacity         | BAAQMD<br>6-1-301 and<br>SIP 6-301 | Y   |                   | Ringelmann No.1 ≤ 3 minutes aggregated in any hour   | BAAQMD<br>Condition<br>#14990, Part 1 | Р/М                  | Visible<br>emission<br>monitoring | Y    |        |
| PM              | BAAQMD<br>6-1-305 and<br>SIP 6-305 | Y   |                   | Fallout of visible particles   |                                       | Ň                    |                                   | Y    |        |
| FP              | BAAQMD<br>6-1-310 and<br>SIP 6-310 | Y   |                   | 0.15 gr/dscf   |                                       | N                    |                                   | Y    |        |
| FP              | BAAQMD<br>6-1-311 and<br>SIP 6-311 | Y   |                   | 40 lb/hr   |                                       | N                    |                                   | Y    |        |
| SO <sub>2</sub> | BAAQMD<br>9-1-301                  | Y   |                   | GLC <sup>1</sup> of 0.5<br>ppm for 3 min<br>or 0.25 ppm<br>for 60 min or<br>0.05 ppm for<br>24 hours |                                       | N                    |                                   | Y    |        |
|                 | BAAQMD<br>9-1-302                  | Y   |                   | sulfur<br>emissions not<br>to exceed 300<br>ppm, dry   |                                       | N                    |                                   | Y    |        |

<sup>&</sup>lt;sup>1</sup> Ground Level Concentration

## Applicable Limits and Compliance Monitoring Requirements

### Table VII-F S-16 Pneumatic Cement Transport System

| Type of | Citation of                        | FE  | Future            | Limit  | Monitoring                            | Monitoring           | Monitoring                        | Comp | liance |
|---------|------------------------------------|-----|-------------------|--|---------------------------------------|----------------------|-----------------------------------|------|--------|
| Limit   | Limit                              | Y/N | Effective<br>Date |  | Requirement<br>Citation               | Frequency<br>(P/C/N) | Туре                              | Yes  | No     |
| Opacity | BAAQMD<br>6-1-301 and<br>SIP 6-301 | Y   |                   | Ringelmann No.1 ≤ 3 minutes aggregated in any hour | BAAQMD<br>Condition<br>#14991, Part 1 | P/M                  | Visible<br>emission<br>monitoring | Y    |        |
| PM      | BAAQMD<br>6-1-305 and<br>SIP 6-305 | Y   |                   | Fallout of visible particles                       |                                       | N                    |                                   | Y    |        |
| FP      | BAAQMD<br>6-1-310 and<br>SIP 6-310 | Y   |                   | 0.15 gr/dscf                                       |                                       | N                    |                                   | Y    |        |
|         | BAAQMD<br>6-1-311 and<br>SIP 6-311 | Y   |                   | 40 lb/hr   |                                       | N                    |                                   | Y    |        |

## Applicable Limits and Compliance Monitoring Requirements

#### Table VII-G S-17 Surface Coater

| Type of<br>Limit | Citation of<br>Limit                     | FE<br>Y/N | Future<br>Effective | Limit  | Monitoring<br>Requirement             | Monitoring<br>Frequency | Monitoring<br>Type                | Comp | liance |
|------------------|--|-----------|---------------------|--|---------------------------------------|-------------------------|-----------------------------------|------|--------|
|                  |  |           | Date                |  | Citation                              | (P/C/N)                 |                                   | Yes  | No     |
| VOC              | BAAQMD<br>8-19-302.2                     | Y         |                     | VOC limit of 2.8 lb/gal  | BAAQMD<br>8-19-501                    | P/W                     | coating<br>records                | Y    |        |
|                  | BAAQMD<br>Condition<br>#20671, part<br>1 | Y         |                     | Coating usage limit of 156,000 gallons per year; solvent usage limit of 5,200 gallons per year | BAAQMD<br>Condition<br>#20671, part 3 | Р                       | Coating and solvent usage records | Y    |        |
|                  | BAAQMD<br>Condition<br>#20671, part<br>2 | Y         |                     | Alternative coating/solven t mass emission limit of 94.9 tons per year                         | BAAQMD<br>Condition<br>#20671, part 3 | Р                       | Coating and solvent usage records | Y    |        |

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#### **Applicable Limits and Compliance Monitoring Requirements**

#### Table VII-H S-33 Gasoline Dispensing Facility (Non-Retail)

| Type of    | Citation of   | FE       | Future            | Limit          | Monitoring              | Monitoring        | Monitoring  | Comp | liance   |
|------------|---------------|----------|-------------------|----------------|-------------------------|-------------------|-------------|------|----------|
| Limit      | Limit         | Y/N      | Effective<br>Date |                | Requirement<br>Citation | Frequency (P/C/N) | Туре        | Yes  | No       |
| POC        | BAAQMD        | N        |                   | minimum        | BAAQMD                  | P/A               | Source Test | Y    |          |
|            | 8-7-301.10    |          |                   | vapor recovery | Condition               |                   |             |      |          |
|            |               |          |                   | efficiency of  | #18432, part 2          |                   |             |      |          |
|            |               |          |                   | lesser of 98%  |                         | ł                 |             |      |          |
|            |               |          |                   | or CARB-       |                         |                   |             |      |          |
|            |               |          |                   | certified      |                         |                   |             |      |          |
|            |               |          |                   | efficiency for |                         |                   |             |      |          |
|            |               |          |                   | new or         |                         |                   |             |      |          |
|            | Į.            |          |                   | modified       |                         |                   |             |      |          |
|            |               |          |                   | systems        | <u></u>                 |                   |             |      |          |
|            | BAAQMD        | N        |                   | Fugitives ≤    |                         | N                 |             | Y    |          |
|            | Regulation    |          |                   | 0.42 lb/1000   |                         |                   |             |      |          |
|            | 8-7-313.1     | <u> </u> |                   | gallon         |                         | <u> </u>          |             |      |          |
|            | BAAQMD        | N        |                   | Spillage ≤     |                         | N                 |             | Y    |          |
|            | Regulation    |          |                   | 0.42 lb/1000   |                         |                   |             |      |          |
|            | 8-7-313.2     |          |                   | gallon         |                         |                   |             |      |          |
|            | BAAQMD        | N        |                   | Liquid Retain  |                         | N                 |             | Y    |          |
|            | Regulation    |          |                   | + Spitting ≤   |                         |                   |             |      | [        |
|            | 8-7-313.3     |          |                   | 0.42 lb/1000   |                         |                   | 1           |      |          |
|            |               |          |                   | gallon         |                         | <u> </u>          |             |      |          |
|            | None          | N        |                   | None           | BAAQMD                  | P/M               | Records     | Y    |          |
|            |               |          |                   |                | Regulation              |                   |             |      |          |
|            |               |          |                   |                | 8-7-503                 |                   |             |      |          |
|            | SIP           | Y        |                   | 95% recovery   |                         | N                 |             | Y    |          |
|            | Regulation 8- |          |                   | of gasoline    |                         |                   |             |      |          |
|            | 7-301.2       | ļ        |                   | vapors         |                         |                   |             |      |          |
| Gasoline   | BAAQMD        | Y        |                   | 940,000        | BAAQMD                  | P                 | Records     | Y    |          |
| throughput | ll .          |          |                   | gallons per    | Regulation              |                   | ţ <b>,</b>  |      | [        |
|            | #18432, part  |          |                   | year           | 8-7-503                 |                   |             |      |          |
|            | 1             |          |                   |                |                         | <u> </u>          |             |      | <u> </u> |

Applicable Limits and Compliance Monitoring Requirements

### Table VII-I S-40 Portable Abrasive Blasting Unit #1

| Type of | Citation of | FE<br>Y/ | Future            | Limit           | Monitoring              | Monitoring           | Monitoring | Comp | liance |
|---------|-------------|----------|-------------------|-----------------|-------------------------|----------------------|------------|------|--------|
| Limit   | Limit       | N        | Effective<br>Date |                 | Requirement<br>Citation | Frequency<br>(P/C/N) | Туре       | Yes  | No     |
|         | BAAQMD      | Y        |                   | Ringelmann      |                         | N                    |            | Y    |        |
| Opacity | 12-4-301    |          |                   | No. 1           |                         |                      |            |      |        |
|         |             |          |                   | Limitation      |                         |                      |            |      |        |
|         | BAAQMD      | Y        |                   | Ringelmann      |                         | N                    |            | Y    |        |
|         | 12-4-302    | 1        |                   | No. 2           |                         |                      |            |      |        |
|         |             |          |                   | Limitation      |                         |                      |            |      |        |
| Usage   | BAAQMD      | Y        |                   | 12 tons per 12- | BAAQMD                  | P/D                  | records    | Y    |        |
|         | Condition   |          |                   | month period    | Condition 13321,        |                      |            |      |        |
|         | 13321,      |          |                   | or 243 lbs per  | part 3                  |                      |            |      |        |
|         | part 1      |          |                   | calendar day    |                         |                      |            |      |        |

## Table VII-J S-41 Portable Abrasive Blasting Unit #2

| Type of | Citation of<br>Limit                 | FE<br>Y/<br>N | Future            | Limit  | Monitoring                           | Monitoring           | Monitoring | Compliance |    |
|---------|--------------------------------------|---------------|-------------------|--|--------------------------------------|----------------------|------------|------------|----|
| Limit   |                                      |               | Effective<br>Date | i li   | Requirement<br>Citation              | Frequency<br>(P/C/N) | Туре       | Yes        | No |
| Opacity | BAAQMD<br>12-4-301                   | Y             |                   | Ringelmann<br>No. 1<br>Limitation                                    |                                      | N                    |            | N/A*       |    |
|         | BAAQMD<br>12-4-302                   | Y             |                   | Ringelmann No. 2 Limitation  |                                      | N                    |            | N/A*       |    |
| Usage   | BAAQMD<br>Condition<br>13321, part 4 | Y             |                   | 1.5 tons per<br>12-month<br>period or 1000<br>lbsper calendar<br>day | BAAQMD<br>Condition 13321,<br>part 6 | P/D                  | records    | N/A*       |    |

<sup>\*</sup> Note: S-41 Portable Abrasive Blasting Unit #2 has not been used during this reporting period.

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## **Applicable Limits and Compliance Monitoring Requirements**

Table VII-K S-42 Cold Cleaner #2 S-43 Cold Cleaner #3

| Type of<br>Limit | Citation of<br>Limit                        | FE<br>Y/N | Future<br>Effective | Limit                  | Monitoring<br>Requirement             | Monitoring<br>Frequency | Monitoring<br>Type | Compliance |    |
|------------------|---|-----------|---------------------|------------------------|---------------------------------------|-------------------------|--------------------|------------|----|
|                  |   |           | Date                |                        | Citation                              | (P/C/N)                 |                    | Yes        | No |
| POC              | BAAQMD<br>Condition<br>#16938, part<br>2(a) | Y         |                     | 101 pounds<br>per year | BAAQMD<br>Condition<br>#16938, part 3 | P                       | Usage<br>Records   | Y*         |    |
| NPOC             | BAAQMD<br>Condition<br>#16938, part<br>2(b) | Y         |                     | 0 pounds per<br>year   | BAAQMD<br>Condition<br>#16938, part 3 | P                       | Usage<br>Records   | Y*         |    |

<sup>\*</sup> Note: Only S-43 Cold Cleaner has been used during this reporting period.

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## Applicable Limits and Compliance Monitoring Requirements

#### Table VII - L S-52 STANDBY GENERATOR DIESEL ENGINE

| Type of            | Citation of                         | FE  | Future            | Limit  | Monitorin                                | Monitorin                 | Monitoring                       | Comp | liance |
|--------------------|-------------------------------------|-----|-------------------|--|--|---------------------------|----------------------------------|------|--------|
| Limit              | Limit                               | Y/N | Effective<br>Date |  | g<br>Requireme<br>nt Citation            | g<br>Frequency<br>(P/C/N) | Туре                             | Yes  | No     |
| Opacity            | BAAQMD 6-<br>303.1 and SIP<br>6-303 | Y   |                   | Ringelmann No.2 ≤ 3 minutes aggregated in any hour   |  | N                         |                                  | N/A* |        |
| FP                 | BAAQMD<br>6-1-310 and<br>SIP 6-310  | Y   |                   | 0.15 grain/dscf  |  | N                         |                                  | N/A* |        |
|                    | BAAQMD<br>6-1-310 and<br>SIP 6-310  | Y   |                   | 0.15 grain/dscf<br>@ 6% O2   |  | N                         |                                  | N/A* |        |
| SO2                | BAAQMD 9-<br>1-301                  | Y   |                   | GLC <sup>1</sup> of 0.5 ppm for 3<br>min or 0.25 ppm for<br>60 min or 0.05 ppm<br>for 24 hours   | BAAQMD<br>Condition<br>#20974,<br>part 1 | P/M                       | Fuel<br>Certification<br>Records | N/A* |        |
|                    | BAAQMD 9-<br>1-304                  | Y   |                   | sulfur emissions not to exceed 300 ppm, dry  | BAAQMD<br>Condition<br>#20974<br>part 1  | P/M                       | Fuel<br>Certification<br>Records | N/A* |        |
| Operating<br>hours | BAAQMD 9-<br>8-330                  | Y   |                   | 100 hours of reliability-related operation per calendar year until 1/1/12 50 hours of reliability-related operation per calendar year as of 1/1/12 | BAAQMD<br>Regulation<br>9-8-530          | P/M                       | Records of operation             | N/A* |        |

<sup>\*</sup> Note: S-52 Emergency Generator has not been used during this reporting period.

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• Opacity Testing. This facility complies with the fugitive emissions from buildings or structure housing any iron and steel foundry emissions sources subject to opacity limit in section 63.10895(e) for the building housing its Cupola melting furnace.

Based upon information and belief formed after reasonable inquiry, I certify that the statements above are true, accurate, and complete.

If you have questions, please contact Mr. Dioni Araza at 510-441-5865.

Sincerely,

UNITED STATES PIPE AND FOUNDRY COMPANY, LLC

Henry W. Mentink Plant Manager

Mr. Wayne Kino – Compliance Director, Bay Area Air Quality Management District

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#### UNITED STATES PIPE AND FOUNDRY COMPANY, LLC

1295 WHIPPLE ROAD UNION CITY, CALIFORNIA 94587 (510) 441-5810

January 29, 2019

Mr. Doug McDaniel U.S. EPA Region 9 75 Hawthorne Street San Francisco, CA, 94105

Subject:

Semi-Annual Monitoring Report, 40 CFR 63, Subpart ZZZZZ

U. S. Pipe and Foundry Company, Union City Pipe Plant, Facility A0083

Dear Mr. McDaniel:

United States Pipe and Foundry Company, LLC, Union City Pipe Plant, is required to submit a semi-annual report pursuant to Title 40 of the Code of Federal Regulations, Part 63, Section 63.10899 (c) of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries Area Sources. The following summary is provided for the Semi-Annual Compliance Report for the reporting period July 1 through December 31, 2018:

- Management Practices for Metallic Scrap. This facility has prepared and operated by written materials specifications for metallic scrap according to section 63.10885;
- Management Practices for Binder Formulation. This facility has not owned or operated a furfuryl alcohol warm box mold or core making line, therefore the no methanol requirement for the catalyst portion of each binder chemical formulation according to section 63.10866 does not apply;
- Management Practices for Mercury Scrap. This facility has participated in and purchased motor vehicles scrap only from scrap providers who participate in a program for removal of mercury switches that has been approved by the EPA Administrator according to section 63.10885(b)(2)(i) through 63.10885(b)(2)(iii);
- Operation of a Capture and Collection System (Cupola Baghouse). This facility has operated a capture and collection system for the Cupola subject to this subpart according to section 63.10895(b);
- Operation and Maintenance Plan for the Control Device (Cupola Baghouse). This
  facility has prepared and operated by an operation and maintenance plan according to
  section 63.10896(a).
- Performance Test Requirements. This facility complies with the PM or total metal HAP emissions limit in section 63.10895(c)(1) for its Cupola melting furnace.

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